

RECEIVED
FEDERAL ELECTION
COMMISSION

August 9, 2012

Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

2012 AUG 14 PM 12:

MUR # 6627

OFFICE OF GENERAL
COUNSEL

To whom it may concern;

I want to bring to the attention of the Federal Election Commission a number of blatant violations of federal election code by Missouri Seventh Congressional District Republican Candidate Mike Moon. This letter and evidentiary documentation is foundational to illuminating the gross disregard for federal law displayed by the Moon for Congress campaign. We live in a society governed by the rule of law and expect to be governed by elected officials who adhere to the letter and spirit of those laws. Any candidate who wishes to seek higher office is, and should be, held to a higher standard of scrutiny and governance. The Moon campaign's disregard for rule of law is cause for great concern. As an opposing candidate in the same race (Stilson for US Congress, Missouri CD-7), I recognize political campaigns are held to a higher standard of public scrutiny and regulatory oversight than the average citizen. Furthermore, we must all play by the same rules during an election. It is clear Mr. Moon's campaign feels the rules do not apply to them- only to everyone else.

I have substantive evidence and documentation to show Mr. Moon's campaign has clearly violated federal election laws in the following instances:

Violation #1: Mr. Moon has personally appeared and solicited campaign contributions on "The Gun Show" with Matt Canovi on at least 20 separate occasions during this election cycle. Mr. Canovi's radio program is paid air time and does not fall under the purview of 47 USC §315, otherwise known as the "Equal Time Rule". After inquiring with the radio station (104.1 KSGF) that hosts Mr. Canovi's program, I was informed the show was purchased "ad time" and similar time slots sold for a minimum of \$1,000 per month for one hour per week. Mr. Canovi features Mr. Moon on his show anywhere from one to two hours for the total two hour show and both Mr. Moon and Canovi solicit donations and advertise for Mr. Moon's campaign during show air time. Upon the FEC's request, I am willing to furnish recordings of the show to support my claim. With this information, we can assume Mr. Canovi's show airs for two hours per week at an approximate cost of \$2,000 per month.

It is clear Mr. Moon has received far above the legal \$2,500 maximum contribution per election cycle. Because Mr. Moon and Canovi advertise and promote Mr. Moon's Congressional campaign and solicit donations during the show, Mr. Moon's appearance constitutes a radio advertisement and/or infomercial and thus is a contribution in-kind from Mr. Canovi to Mr. Moon. Mr. Moon's appearances average approximately one hour per week for at least the past six months. Based upon these estimates, Mr. Moon and his campaign have received a minimum of \$6,000 of in-kind campaign contributions from Mr. Canovi- more than \$3,500 above the legal limit. In addition, Mr. Moon has never claimed his appearances on the radio show as a campaign expenditure in-kind from Mr. Canovi even though he frequently solicits financial aid

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electoral support on the show. This violation must, and should be, prosecuted to the fullest extent allowed by federal election law.

Violation #2: Mr. Moon and his campaign attended the Rally for Common Sense on May 19th, 2012. The cost for federal candidates was \$1,000 per booth. As Exhibit A1 shows, no free booths were given at the Rally as the sponsor is a corporate non-profit and thus ineligible to donate to a candidate's campaign. However, Mr. Moon has documented he was handing out literature and campaigning at the rally (Exhibit A2). This literature is documented in Exhibits B1, B2, and F. In addition, Exhibit A3 shows Mr. Moon's booth at the Rally for Common Sense. Thus, he had a booth. However, Mr. Moon's July 2012 FEC report shows no documentation for an in-kind or direct receipt or disbursement for the Rally for Common Sense. There are further issues with this matter though. One of Mr. Moon's volunteers, Jonica Hope (Exhibit A4), may have potentially waived Mr. Moon's \$1,000 fee for the Rally for Common Sense as she is the rally's webmaster as listed on Rally for Common Sense's website (Exhibit A4). If this is the case, a 501(c)3 non-profit donated to Mr. Moon's campaign (which is irrelevant to the FEC but should be noted nonetheless to establish the propensity for Mr. Moon's campaign to disregard the rule of law) and, most importantly, a corporate entity was responsible for the \$1,000 contribution in-kind. This is in direct violation of 11 CFR § 114.2 which prohibits corporate donations to federal candidates.

Violation #3: The Moon for Congress campaign has provided campaign literature since the start of the election cycle that fails to follow rules governing printed election literature. As shown in Exhibits B1, B2, B3, and B4, the Moon for Congress campaign is in blatant violation of CFR §110.11(c)(2)(ii) which requires a bounded box around all printed public communications (e.g. campaign literature). The printed communication does not contain any bounded box.

Violation #4: Mr. Moon's campaign signs do not follow the federal election code requirements that the authorizing candidate and/or candidate committee be included in all printed communications, billboards, or advertisements per CFR §110.11(c)(1) and "must be presented in a clear and conspicuous manner, to give the reader, observer, or listener adequate notice of the identity of the person or political committee that paid for and, where required, that authorized the communication" [CFR §110.11(c)(1)]. As is clearly shown in Exhibit C1, Mr. Moon's campaign takes responsibility for this sign by promoting and advertising it on their Facebook page. However, the disclaimer listed on the sign, as shown in Exhibits C2 and C3, shows the sign as "Paid for by Bob Estep". The nature of this billboard as a printed communication conflicts with election code in two specific instances:

(1) The disclaimer, located in the lower right hand corner of the sign may not meet the "clear and conspicuous" test as required by FEC law. The pen seen next to the disclaimer in Exhibit B3 measures 6 inches end to end. On their website, the FEC states signs measuring larger than 24 x 36 inches will be judged for compliance on a case by case basis. I ask the FEC look into this matter to determine if this sign follows the letter and spirit of the law as the FEC intends.

(2) The sign is clearly an "in-kind" contribution to the Moon for Congress campaign and appears to have been claimed as such by Mr. Moon's campaign committee (FEC ID#

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C00468355) as a contribution in-kind by Bob Estep for "services provided" on June 26, 2012 for a Type 4 expenditure (advertising) on Schedule B of the Moon for Congress July 2012 Quarterly FEC report. Thus, the disclaimer provided on the sign is either wrong or the Moon for Congress campaign has failed to disclose a contribution in-kind. Either of these constitute investigation by the FEC for an election code violation.

Violation #5: Mr. Moon's campaign has listed these signs on his Twitter and Facebook pages. As seen in Exhibits D1, D2, D3, D4, and D5, Mr. Moon's signs have no disclaimer whatsoever when, as the neighboring sign of his opponent in Exhibit D3 shows, including a disclaimer is in no way prohibitive. I have provided additional images of the dozens of signs Mr. Moon's campaign produced and placed throughout the district to show this was consistent for signs produced. Per CFR §110.11(c)(1), the Moon for Congress campaign is required to provide a disclaimer and it "must be presented in a clear and conspicuous manner, to give the reader, observer, or listener adequate notice of the identity of the person or political committee that paid for and, where required, that authorized the communication". The signs in these images fail on all accounts. Furthermore, these signs were posted throughout the district prior to the June 30th reporting period close for the July 15th FEC Quarterly Report. The presence of these signs in the district, lack of a disclaimer, and failure to report in the Moon for Congress July Quarterly Report warrant further investigation and action by the FEC. The lack of disclosure in this instance is disconcerting to say the least and should be prosecuted to the fullest extent as it appears the Moon for Congress campaign feels the rules do not apply to them.

Violation #6: The photos provided in Exhibits E1 and E2 from the Mike Moon for Congress Facebook page features Mr. Moon and his spouse standing in front of a tractor-trailer painted as an advertisement for his campaign. There are multiple issues to be addressed with this sign:

- (1) The sign features no disclaimer as seen in Exhibit E2 and violates CFR §110.11(c)(1) accordingly.
- (2) The rental and or purchase fee for this trailer including the painting services suggest all labor and supplies may exceed the legal \$2,500 contribution limit. This issue warrants further review and investigation on behalf of the FEC.
- (3) The expenditure for this sign may not have been reported by the Moon for Congress campaign and, if it has been reported, may have been grossly underestimated to keep the contribution beneath the \$2,500 limit.

Violation #7: The Mike Moon for Congress campaign is providing additional campaign literature in the form of pocket Constitutions. These pocket Constitutions do not include the required "Paid for by" disclaimer in any location on the literature. Furthermore, these pocket Constitutions have been seen at campaign events that include the July Quarterly reporting period. A review of the July Quarterly Finance Report for Mike Moon for Congress suggests the Moon campaign has not reported any expenditure, contribution in-kind, or otherwise for this literature. Exhibit F is a copy of the pocket Constitution provided by the Moon for Congress campaign.

Violation #8: Mr. Moon's campaign is raffling off an Apple iPad 2 as a fundraising effort. While the neighboring "CCW with Matt Canovi" was listed in the Moon

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campaign's FEC July 2012 Quarterly report as a "contribution in-kind" from Mr. Canovi for \$200, the Apple iPad 2 is not listed as a disbursement or receipt in the same FEC report. A visit to Apple's website shows the iPad 2 retails starting at \$399 and is therefore subject to the reporting requirements for receipts or disbursements in excess of \$200. Exhibit G1 shows the raffle on Mr. Moon's website and Exhibit G2 shows Mr. Moon's volunteers and campaign were fully aware of its stated value.

Violation #9: Exhibit H is taken from Springfield's Community Free Press edition from July 25-August 7, 2012. This advertisement on behalf of "Citizen Eric Wilber" constitutes an independent expenditure as defined by 11 CFR §109.11, 110.11(a)(2) and (b)(3). A search of the FEC website shows no Independent Expenditure Report was filed for this communication (assuming it exceeded the minimum amount) and Mr. Wilber is not a registered Political Committee. He must include personal contact information if his name is to be the only disclaimer on the communication. Furthermore, the disclaimer is in direct violation of the aforementioned sections of 11 CFR.

Violation #10: The Moon for Congress campaign has posted on their website images of "Mike Moon for Congress" window decals. As outlined in the prior violations, Mr. Moon and his campaign appear to preclude themselves from all regulations and requirements under the purview of the Federal Election Commission. The aforementioned decal in Exhibit I is a public communication and requires a disclaimer under CFR §110.11(c)(1). I have a similar decal for my campaign on my vehicle. It was in no way prohibitive for me to include a disclaimer on my decal.

The aforementioned violations constitute a gross disregard for the law by Mike Moon and his Congressional campaign. Mr. Moon professes himself as a "Constitutional Conservative" who has "faith based ethics". However, these violations show Mr. Moon and his campaign neither uphold nor adhere to such values. I respectfully ask the Commission take investigate these violations I outlined above. I have faith the Commission will take this matter seriously and enforce and prosecute to the fullest extent. Our elected officials must maintain a higher standard than Mr. Moon and his campaign. It is unfortunate Mr. Moon and his campaign see fit to lecture our district about laws while their campaign acts as if the rules don't apply to them.

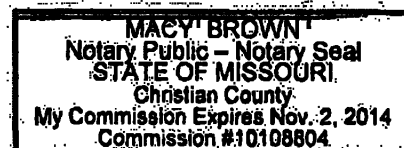
I would like to thank the Commission in advance for their anticipated investigation and actions regarding these violations. Should you have any questions, please do not hesitate to contact me for clarifications, comments, or questions.

Sincerely,



Thomas Shane Stilson

Ozark, MO 65721



Signed and sworn to
before me:

Macy Brown
exp: 11/02/2014

Vendors

We look forward to a bustling Vendor and Exhibit area, and invite you to join us! We welcome most non-profit organizations, food vendors, craftsmen and political candidates. Looking for a non-profit fundraiser? Here it is! Just complete the vendor application below, and you will be contacted shortly. Questions: rallyforcommonsense.orders@gmail.com

Cash prize awarded for best display of patriot pride!

Booth Rental Fees

Vendor / Exhibitor

- ~ No free booths
- ~ Non-Profit (literature only) \$25
- ~ Non-Profit (food) \$50
- ~ Crafts / Merchandise Vendors \$100
- ~ Commercial Food Vendors \$250
- ~ Corporate (national chain) Vendors \$500

Candidate

Note: "Sticker pushing" and pamphleteering in the crowd will not be allowed.

- ~ Mo. legislative candidates – \$100
- ~ Statewide candidates – \$250
- ~ Federal level candidates – \$1000

Guidelines

- Booth space 10' x 10'.
- 10' x 20' and larger available for an additional charge. Notate in application below.
- Each vendor is responsible for their own tables, chairs, canopy, workers, et al.
- Limited electricity available. Notate wattage needs in application.
- NO GENERATORS.
- Ice available \$6/20lbs. Notate approx. quantity in application.
- All walking spaces need to remain clear.
- All vendors are responsible for leaving their booth area clean.
- No ammunition or fireworks of any kind.
- No selling of animals or alcohol.
- The Rally for Common Sense reserves the right to refuse any application.
- The Rally for Common Sense, Common Sense Exchange, its officers, directors, and members are not responsible for any accidents, theft or loss.
- All commercial vendors are responsible for carrying their own liability insurance.
- All fees are non-refundable.

COUNTDOWN

- Rally for Common Sense:
in 13 days, 0 hours, 7 minutes

See your Editors in RealTime!
Get the Feed. Live Traffic Feed.

Get Feed It Now!

A visitor from Ozark, Missouri
viewed this page 11 mins ago

A visitor from Branson, Missouri
viewed this page 11 mins ago

A visitor from Orem, Utah
arrived 21 mins ago

A visitor from Orem, Utah
arrived 21 mins ago

A visitor from Orem, Utah
arrived 21 mins ago

A visitor from Dubuque, Iowa
viewed this page 21 mins ago

A visitor from Saint Louis, Missouri
viewed this page 21 mins ago

A visitor from United States
viewed this page 21 mins ago

A visitor from Spring, Texas
viewed this page 21 mins ago

A visitor from Shelby, North Carolina
viewed this page 21 mins ago

Real-time view - Menu

20,000 Visitors \$22.9

Instant Traffic Delivery
Increase Sales to Your Site
Click Here

Facebook

CLICK & SHARE

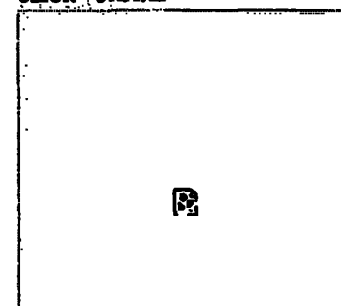


Exhibit A1

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Mike Moon For Congress
Like This Page · May 21

William Looman and I at the Rally For Common
Sense! — with William Looman, William Robert

Exhibit A2

13044342226



Amanda Moon Richards
May 19 1*

Share



Exhibit A3



Jonica Hope

Mike's website is up and running. Check frequently for updates. The main thing to look for right now is personal endorsements and the

www.mikemoonforcongress.com

Like · Comment · May 24 at 11:23am near Nixa

👍 3 people like this.



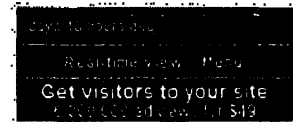
Amanda Moon Richards Looks great!!!

May 24 at 9:13pm via mobile · Like

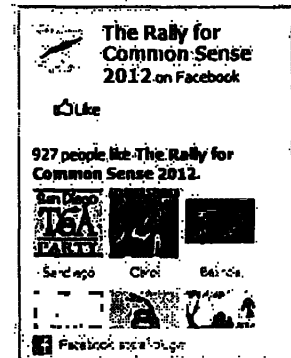
Exhibit A4



Rally for Common Sense Committee
Jonica Hope - Webmaster and more
Cheryl Arledge
Kelly Jaye Pratt
Rita Silic
Phil Todd
Karen Randall
Mark France
John Errante
Jim Lambirth
Tracey Oetterer Clines
Thomas Duane Smith
William Temple
Maggie Kress
Pete Dingeldej
Dee Rock



Facebook
CLICK • SHARE



I am:
☐ Republican
☐ Democrat
☒ Awake



Exhibit A4

LIBERTY AND JUSTICE FOR ALL MIKE MOON FOR CONGRESS



Mike is married to Denise, pictured above with their family.
Mike and Denise have homeschooled their children since 1993.

MIKE MOON
CONSTITUTIONAL
CONSERVATIVE



for
CONGRESS



Missouri's 7th Congressional District

MikeMoonforCongress.com

P.O. Box 607
Springfield, MO 65801
417-751-0243

Paid for by Mike Moon for Congress

Exhibit B1

MIKE MOON STANDS STRONG ON FREEDOM PRINCIPLES

Agriculture...

As a Lawrence County cattleman, Mike believes the freedom to raise animals and produce food must be protected.

Energy...

Mike supports private exploration and production of all domestic energy sources, including oil, coal, natural gas, and nuclear power.

Defense...

The maintenance of a strong, well-trained military is essential to National security. Wars should be entered into with caution as a result of a declaration exclusively by Congress.

Protect Social Security...

Government officials must be held accountable to protect the Social Security Trust Fund so that promises made to American citizens can be fulfilled.

Second Amendment...

Mike holds our Founding Father's belief that all law-abiding citizens have the right to own and use arms without government interference.

Sovereignty...

Each state is like a separate nation: free, independent with powers not expressly delegated to the federal government.

Governmental Authority...

Congressional, Presidential, and Court authority should be limited to the Constitution.

Exhibit B2

Billy Long voted against the Constitution

H.R. 1540 - National Defense Authorization Act (allows for indefinite detainment of American citizens - 4th, 5th and 6th amendment violations).

H.R. 347 - restricts the freedom of speech - violation of 1st amendment

Patriot Act - circumvents the 4th amendment

Cybersecurity Act - violates the 4th amendment

H.R. 1 - continued spending \$27 million for NASCAR

Pigford II Lawsuit - awarded \$1.2 billion of your money to farmers instead of allowing the courts to decide the outcome.

Billy Long voted to increase the national debt by \$2.4 trillion dollars (the debt is now approaching \$16 trillion).

Is Billy Long still Fed Up? Apparently NOT!

Elect the "Best Option to Billy Long."

Vote Mike Moon on August 7th

MikeMoonforCongress.com

P.O. Box 607

Springfield, MO 65801

Exhibits B3 & B4



MIKE MOON
CONSTITUTIONAL
CONSERVATIVE
REPUBLICAN
for U.S. CONGRESS

Missouri's 7th Congressional District

Mike Moon's Pledge to YOU

Mike will introduce legislation to repeal all unconstitutional laws.

Mike will vote according to the Constitution.

Mike will not take a Congressional pension.

Mike will NOT accept gifts, favors, or travel from lobbyists or other special interest groups. Nobody will buy Mike's vote.

Mike will work to protect the institution of the family.

Mike will protect and value all human life from the unborn to the elderly.

Mike will NOT vote in favor of any bill that increases the size and scope of the Federal government from the level it stands today.

Mike will vote to limit regulations that are crippling our farmers, landowners, and our energy supplies.

Mike will never vote to send our troops to fight in undeclared war.

Mike will vote to fulfill our promise to our veterans.

Mike will honor Missouri's, and other states' sovereignty as declared in the 10th amendment.



Paul for Mike Moon for Congress

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Mike Moon For Congress
June 27, 2008

Travis Edwards,

Brother Mike, Tom Pyle, Don Edwards, and 12 others like this.

1 like



Eric Wilber Calling all truck owners: if you're going around? Please give Tom Pyle your name, we will coordinate with each person on this.

June 27 at 11:00am



Steve Robertson Hope you get to come to Hooch, MO.

June 27 at 11:00am



I like Moon For Congress May Steve Robertson I attended the meeting in Hooch on June 1st and plan to be at the Washington Feed on July 31st. I'm hoping to work in as least another visit before August 7th. Would you like to round up a few friends I could meet?

June 27 at 11:00am

Exhibit C1



Exhibit C2

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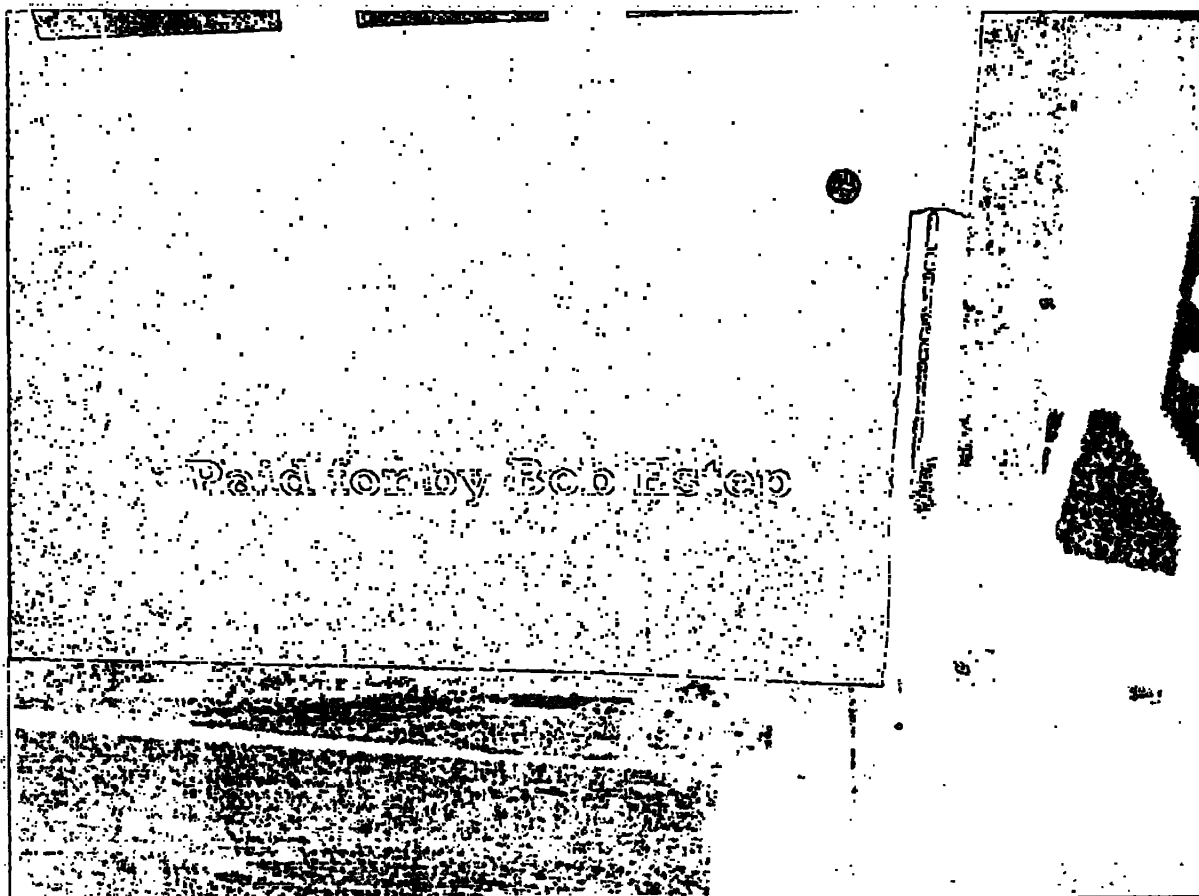


Exhibit C3



Exhibit D1

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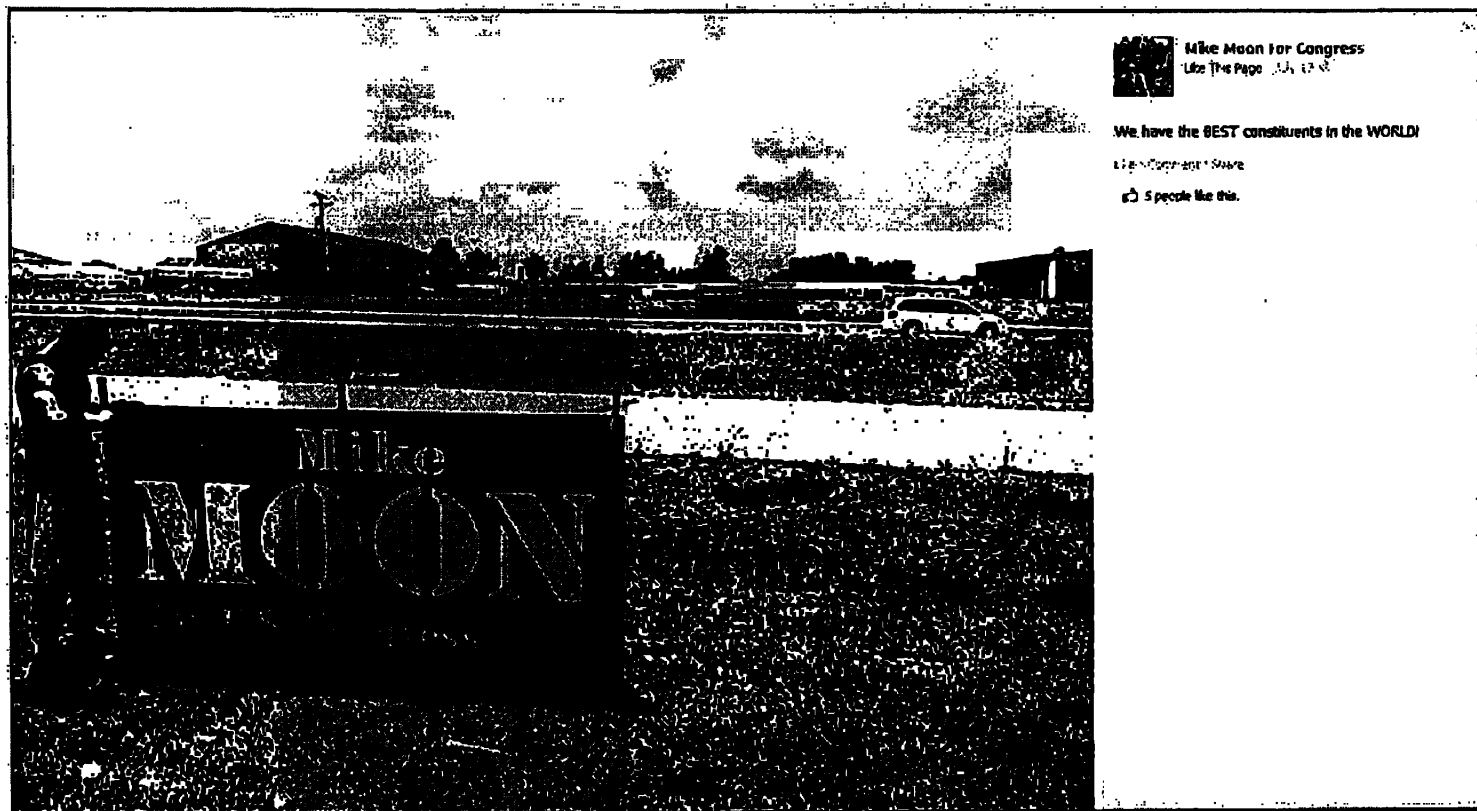


Exhibit D2



Exhibit D3

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Exhibit D4



Exhibit D5

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Michael Land • Mike Moon For Congress
July 12 '14

Look for "Mike Moon For Congress" semi trailer located on Hwy 160/13 just beyond South St. in Nixa. Please let us know if you see it. Thanks! — with Mike Moon in Nixa.

Like Comment Share

4 people like this.

1 share



Michael Land Thanks Bro
July 12 at 6:42pm · Like · 1



Paul Hansen Yes, was going to Needs Spring the other day and saw that great sign.
July 17 at 9:14am · Like



Renee Watson Waters Yes! It's right next to Safari Offroad, too...also Mike Moon supporters! July 18 at 4:16pm · Like

Exhibit E1



Exhibit E2

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With the original Signers

I, as one of We, the People of the United States, affirm that I have read or will read our U.S. Constitution and pledge to maintain and promote its standard of liberty for myself and for my posterity, and do hereby attest to that by my signature.

Pledger

George Washington
George Washington, Witness



**Mike
MOON**
for U.S. CONGRESS

MikeMoonForCongress.com

P.O. BOX 607
SPRINGFIELD
MO
65801



THE CONSTITUTION OF THE UNITED STATES

...its only keepers, the people.

—George Washington

Exhibit F

If you have an upcoming event that you would like Mike to be at please email us at campaignmanager@mikemoonforcongress.com

difference in your country!

July 26 - Taney County Republican Women, English Inn, Hollister, MO, 6pm
July 27 - Barry County Central Committee Rally, Crowder College, Hwy 27, 9:00
July 27 - Big Bear Lodge, Fundraiser with Cynthia Davis
July 27 - August 4 - Ozark Empire Fair, 11am - 11pm (need volunteers)



Help Mike Moon win on August 7th. Donate today to the campaign.



CCW with Matt Canovi

Includes: all training material, range fees, handbook, and weapon rental.



iPad2 Raffle

Only 60 raffle tickets available. Purchase chance today to win a new iPad2.

\$100.00

Add to Cart

\$20.00

Add to Cart



Exhibit G1



Michael Hope

Fund Raiser Ideal; I am posing for us to sell only 60 tickets at \$20 for an Ipad 2 (retail value \$399.00) I will buy 2 tickets, I want to know how many you can buy/sell for Mike? Your thoughts? http://www.google.com/imgres?imgurl=http%3A%2F%2Fi.i.com.com%2Fcnwk.1d%2Fi%2Fim%2F2011%2F03%2F02%2FAppleiPad2_610x407.jpg&imgrefurl=http%3A%2F%2Fnews.cnet.com%2F8301-30686_3-20038297-266.html&h=407&w=610&sz=249&tbnid=j3DVEFFJjKW-bM%3A&tbnh=90&tbnw=135&prev=%2Fsearch%3Fq%3Dpictures%28of%28an%28ipad%282%26tbnid%3Disch%26tbo%3Du&zoom=1&q=pictures+of+an+ipad+2&ddcid=mIE7MIaxLHgIeM&hl=en&sa=X&ei=6NmT82OONGI2AXOnbnpCA&ved=0CJQ8EPUBMA0&dur=1326
May 11 at 10:44pm

2 people like this.

Seen by 13



Scott Rodgers You could well them for 5\$ a ticket and sell 10X as many. just saying.

May 11 at 10:46pm · 2

Exhibit G2

13044342235

Paid for by citizen Eric Wilber

Mike MOON

for U.S. Congress

Exhibit H



Mike Moon For Congress
Like This Page · July 17 ·

Like · Comment · Share

3 people like this.

1 share.

Exhibit I